

FILED

VANESSA L. ARMSTRONG, CLERK

FEB 10 2017

UNITED STATES DISTRICT COURT
for the
WESTERN DISTRICT OF KENTUCKY**U.S. DISTRICT COURT
WEST'N. DIST. KENTUCKY**

UNITED STATES OF AMERICA)

v.)

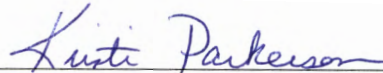
Case No. 3:17-mj-84Ambrocio Jennings
1257 Helck Ave
Louisville, KY 40213
*Defendant***CRIMINAL COMPLAINT**

I, the complainant in this case, state the following is true to the best of my knowledge and belief.

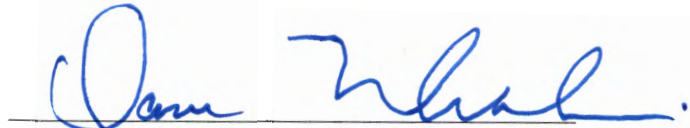
On or about the date(s) of February 9, 2017 in the county of Jefferson in the Western District of Kentucky, the defendant violated:

<i>Code Section</i>	<i>Offense Description</i>
21 USC 841(a)(1)	Possession with Intent to Distribute Cocaine, Heroin and Methamphetamine
18 USC 922 (g)	Possession of a Firearm by a Convicted Felon

This criminal complaint is based on these facts:

☒ Continued on the attached sheet*Complainant's signature*

Kristi Parkerson, U.S. Postal Inspector _____

*Printed name and title**Sworn to before me and signed in my presence.*Date: 02/10/17*Judge's Signature*

City and State: Louisville, Kentucky

U.S.M.S.*Printed Name and Title*

____ (AUSA initials)

AFFIDAVIT

Kristi M. Parkerson, after being duly sworn, deposes and states as follows:

1. I am a U.S. Postal Inspector assigned to investigate the unlawful transportation of contraband, including Title 21 controlled substances, through the United States mail. I have been a Postal Inspector since February 2012, and I am currently assigned to the Louisville, KY Domicile of the United States Postal Inspection Service's Pittsburgh Division.
2. I have received formal instruction from U.S. Postal Inspectors, Assistant United States Attorneys, and other law enforcement agents who have done extensive work in investigating the sale, distribution, and manufacture of controlled substances. I have received controlled substances training through the U.S. Postal Inspection Service and through contacts with experts from state and federal drug enforcement agencies. I have completed a Basic Prohibited Mail Narcotics training course from the United States Postal Inspection Service in June 2015.
3. During my employment as a law enforcement officer, I have performed the following tasks relevant to this search warrant:
 - a. Since May 2012, I have participated in interdictions at the USPS Louisville, KY Processing and Distribution Center searching for packages mailed unlawfully of controlled substances and/or the proceeds from the sale of controlled substances through the United States mail. In particular, I have worked on cases involving the mailing of controlled substances and/or the proceeds from the sale of controlled substances in mail parcels.
 - b. I have participated in controlled deliveries of known drug parcels.
 - c. I have been present for the execution of search warrants on residences where there

was a known drug parcel delivered.

- d. I have participated in interviews with witnesses, cooperating individuals, and informants regarding illegal trafficking in drugs and have read official reports of other officers.
 - e. I have been a surveillance officer observing and recording movements of persons trafficking in drugs and those suspected of trafficking in drugs.
4. On or about January 27, 2017, your Affiant was reviewing previously delivered United States Postal Service (USPS) mailing labels looking for suspicious parcels. Your Affiant identified approximately 30 previously delivered suspicious parcels with similar characteristics from Los Angeles, CA to the Louisville, KY area that had been mailed between June 2016 to the present. After identifying those parcels, your Affiant regularly ran USPS database searches attempting to identify a live parcel, with the same suspicious characteristics, in route to the Louisville, KY area.
5. On Wednesday, February 8, 2017, your Affiant identified two USPS Priority Mail parcels with similar characteristics to the previously delivered suspicious parcels.

PARCELS

- A. Priority Mail parcel 9505514246577038061723 being shipped from: D. Bradley at 4617 Pickford St., LA, CA, to: A. Jennings at 1257 Helck Avenue, Louisville, KY 40213.
 - B. Priority Mail parcel 9505513908467038050680 being shipped from: D. Bradley at 4617 Pickford St., LA, CA, to: T. Allen at 5518 Redondo Circle, Louisville, KY 40218.
6. On Thursday, February 9, 2017, your Affiant intercepted Parcel A and Parcel B from the

Annshire Post Office located at 4500 Annshire Ave, Louisville, KY 40213.

7. Your Affiant transported both parcels to the USPS Louisville Processing and Distribution Center located at 1420 Gardiner Lane, Louisville, KY 40231 to be presented, one at a time, for external examination by Louisville Metro Police Department (LMPD) detector canine “Butch” in a line up with several other control parcels known to not contain controlled substances. According to LMPD Detective Brad Woolridge, “Butch’s” handler, “Butch” indicated a positive alert on the parcels for the odor of a controlled substance the canine is trained to recognize.
8. U. S. Postal Inspector Clint Springer applied for and obtained Search and Seizure Warrants in the Western District of Kentucky for both parcels. Parcel A warrant number 3:17-MJ-77. Parcel B warrant number 3:17-MJ-78.
9. At approximately 10:28 AM, your Affiant executed the warrant on Parcel A. Parcel A was found to contain approximately 4 lbs of suspected methamphetamine.
10. At approximately 10:49 AM, your Affiant executed the warrant on Parcel B. Parcel B was found to contain approximately 2 lbs of suspected methamphetamine.
11. LMPD Detective Gary Huffman applied for and obtained Tracking Warrants for both parcels and Search Warrants for both parcel delivery addresses. LMPD Technical Operations Team Detective Eric McHugh installed GPS tracking devices into both Parcel A and Parcel B. These devices allowed law enforcement officers to monitor the location of the packages. McHugh also installed a wire into Parcel A which would signal an alert to monitoring law enforcement officers when the parcel was opened.
12. Your Affiant, with the assistance of LMPD and Jefferson County Sheriff’s Office (JCSO), proceeded with a controlled delivery of both parcels to the two separate addresses. At

approximately 2:18 PM, your Affiant, dressed as a USPS mail carrier and driving a marked USPS deliver vehicle, delivered Parcel A to 1257 Helck Ave, Louisville, KY 40213 leaving it on the front porch. LMPD Detective McHugh was able to obtain video surveillance prior, during, and after the controlled delivery of Parcel A. At approximately 3:17 PM, your Affiant, dressed as a USPS mail carrier and driving a marked USPS deliver vehicle, delivered Parcel B to 5518 Redondo Circle, Louisville, KY 40218.

13. Following the delivery of Parcel A, a white Chevrolet Suburban with KY license plate 608WDL pulled into the driveway of 1257 Helck Ave. The vehicle is registered to Misty Washington, a known girlfriend of Ambrocio Jennings. An unidentified black female exited the passenger side of the vehicle. The female proceeded to the front porch, picked up Parcel A, and entered into the house. Within minutes, the female exited the house leaving Parcel A inside the house. The female returned to the Suburban and the vehicle pulled away.
14. Shortly after Parcel A was taken inside, a white SUV occupied by a black male (later identified as Adrian Perkins) pulled into the driveway of 1257 Helck Avenue. Perkins pulled his white SUV far enough into the driveway and behind the residence, where visual contact was lost. Shortly after Perkins pulled into the driveway, a black truck occupied by a black male (later identified as Ambrocio Jennings) pulled into the driveway, also pulling behind the residence, far enough into the driveway where visual contact was lost. The black truck is a vehicle known by law enforcement officers to be driven by Ambrocio Jennings. The entire time both vehicles were out of sight, there was no movement on Parcel A inside the residence.
15. A short time later, officers conducting surveillance noticed both Perkins, in the white SUV, and Jennings in his black truck, pulling out of the driveway. Even though Parcel A appeared

to never have been opened or moved inside the residence, LMPD officers decided to attempt to stop both vehicles. LMPD Detective Billy Keltner and LMPD Detective Brad Woolridge attempted the traffic stop, on both vehicles, on Helck Avenue at Gilmore Lane. Jennings, in his black truck, did not stop, and began driving erratically and at high speeds away from the officers, and in the direction of Preston Highway near Gilmore Lane. Perkins was stopped, detained and taken back to 1257 Helck Avenue.

16. Parcel B was retrieved off the porch of 5518 Redondo Circle, Louisville, KY 40218 by JCSO Sheriff John Sheehan while other law enforcement officers were in pursuit of Jennings in the black truck.

17. LMPD Air Patrol Officer, Brian Arnold, was able to assist with visual surveillance of Jennings. According to Arnold, Jennings drove erratically and at high rates of speed. Arnold visually followed Jennings from the time Jennings drive through the shopping center on the corner of Gilmore Lane and Preston Highway until Jennings was apprehended around Bulgar Court and Brashear Drive.

18. During the pursuit, Arnold witnessed Jennings exit the black truck in the rear of 646 Davies Avenue, Louisville, KY 40208. Jennings pulled 3 bags from the truck and threw them between a playhouse and the rear of that residence. Jennings returned to his black truck and backed out of the driveway and drove away. Jennings pulled into the Park Hill Housing Project, exited his vehicle around Brashear Drive and Moore Court, and began walking on foot. Arnold was able to call out Jennings' location and description to LMPD Special Weapons and Tactics (SWAT) Officers. SWAT Officers took Jennings into custody around Bulgar Court and Brashear Drive. Air Patrol directed other members of SWAT to the black truck to be secured. Air Patrol then returned to Davies Avenue landing the helicopter in a

field adjacent to Davies, where Arnold exited the helicopter and ran to the back of 646 Davies Avenue to locate the 3 bags he saw Jennings place behind that residence. Arnold unzipped all three bags and observed a large amount of narcotics, bundled large amounts of cash, and plastic bags with residue and scales. Arnold took photographs with his cellphone and then contacted other officers so they could secure that location as soon as possible.

19. Jennings was taken back to LMPD office located at 701 W. Ormsby Avenue, Louisville, KY 40203. LMPD Detective Mikey Pawul read Jennings his Miranda Rights on audio recording. Jennings requested to speak to his attorney.

20. Your Affiant, with the assistance of LMPD Detective Daniel Evans and Drug Enforcement Administration (DEA) Special Agent, Brian Sanders, transported Ambrocio Jennings to Floyd County Corrections located at 311 Hauss Square, New Albany, IN 47150 to be held overnight until he could be turned over to the U.S. Marshal Service the next day, February 10, 2017.

21. LMPD Detective Gary Huffman applied for and obtained a state search warrant for 646 Davies Avenue, Louisville, KY 40208.

22. At approximately 10:08 PM on February 9, 2017, the search warrant was executed at 646 Davies Ave, Louisville, KY 40208. The three bags found in the bag of the residence, dropped by Ambrocio Jennings, contained approximately \$170,030 U.S. Currency, a stolen Glock 21 handgun, scales, plastic bag with suspected meth residue, approximately 3 lbs 4.2 ozs of suspected heroin, approximately 23 lbs 5.9 ozs of suspected cocaine. Inside the residence, four additional handguns were found.

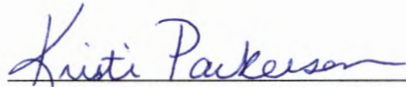
WHEREFORE, based upon the foregoing, there is probable cause to believe that Ambrocio Jennings committed the crimes enumerated in the attached complaint.

FURTHER AFFIANT SAYETH NAUGHT.

Subscribed and sworn to
Before Me, this 2nd day of
February, 2017.



DAVE WHALIN
U.S. MAGISTRATE JUDGE



Kristi Parkerson, US Postal Inspector
AFFIANT